



THE COMMONWEALTH OF MASSACHUSETTS
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September 4, 2002

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Verizon's Alternative Regulation Plan, D.T.E. 01-31 (Phase II)

Dear Ms. Cottrell:

Enclosed for filing please find the Attorney General's Second Set of Document and Information Requests to Verizon Massachusetts, AG-VZ-2-1 to 2-12, together with a Certificate of Service in the above-referenced proceeding. Also, please delete Wilner Borgella from the Attorney General's office and Lee Selwyn of ETI and from the service list. In their place, please insert the following individuals:

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Utilities Division
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Sincerely,

Karlen J. Reed
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(617) 727-2200

KJR/kr

Enc.

cc: D.T.E. 01-31 (Phase II) Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications and Energy on)	
its own Motion into the Appropriate Regulatory Plan to succeed Price Cap)	
Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts')	D.T.E. 01-31
intrastate retail telecommunications services in the Commonwealth)	Phase II
of Massachusetts)	
)	

**ATTORNEY GENERAL'S
SECOND SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide three copies of each response.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within 10 calendar days from receipt of request, as per the Hearing Officer's Ground Rules issued May 7, 2001.

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**ATTORNEY GENERAL'S
SECOND SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

AG-VZ-2-1 Please explain how the Verizon cost models, used to determine UNE costs, allocate corporate operations expense, accounts 6710 and 6720, to the individual UNE costs. Include in the response the work papers associated with the cost allocations.

AG-VZ-2-2 For the Verizon cost model results that were used to support UNE costs that are currently in place, provide the total corporate operations expenses that were used as an input into the modeling process and provide the corporate operations expense that were allocated to the UNE costs for:

- a. Two Wire Links – Analog –Metro
- b. Two Wire Links – Analog –Urban
- c. Two Wire Links – Analog –Suburban
- d. Two Wire Links – Analog –Rural
- e. Line Ports – Analog – Metro
- f. Line Ports – Analog –Urban
- g. Line Ports – Analog – Suburban
- h. Line Ports – Analog - Rural

AG-VZ-2-3 For the Verizon cost model results that were used to support UNE costs that are currently in place, provide the per-line corporate operations expense that were allocated to the UNE costs for:

- a. Two Wire Links – Analog –Metro
- b. Two Wire Links – Analog –Urban
- c. Two Wire Links – Analog –Suburban
- d. Two Wire Links – Analog –Rural
- e. Line Ports – Analog – Metro
- f. Line Ports – Analog –Urban

- g. Line Ports – Analog – Suburban
- h. Line Ports – Analog - Rural

AG-VZ-2-4 For the Verizon cost model results that were used to support UNE costs that are currently in place, provide the per-minute corporate operations expense that were allocated to the UNE costs for:

- a. Tandem Switch Usage – Peak
- b. Tandem Switch Usage – Off Peak
- c. Unbundled Local Switching
- d. Unbundled Shared Trunk Port – Peak
- e. Unbundled Shared Trunk Port – Off Peak
- f. Unbundled local transport – Peak
- g. Unbundled local transport – Off Peak

AG-VZ-2-5 Please refer to Verizon’s response in DTE 01-31 (Phase I) to AG-VZ-5-6 and the Phase II August 28, 2002 testimony of John Conroy, Retail Service Quality Plan Attachment, page 5.

- a. Please provide a copy of the monthly Quality of Service (QOS) report which reports for the most recent month of 2002.
- b. Under Verizon’s Phase II Plan, will Verizon continue to file monthly QOS reports in the same format and covering the same information as the current QOS Report?
- c. If not, please describe the differences in reporting that Verizon proposes the Department allow.

AG-VZ-2-6 Please refer to Paula Brown’s August 28, 2002 testimony, pages 7-8, where you state that the 5% annual rate increases for Residential Basic services was based on the Consumer Price Index.

- a. Explain precisely to what period of time you are referring when using the word “historical,” *i.e.* how many years, what years specifically, etc.?
- b. How does a 5% annual rate increase compare to the Consumer Price Index reported in Verizon MA’s 6th Annual Massachusetts Price Cap Compliance Filing (2001)?
- c. How does a 5% annual rate increase compare to the Consumer Price Index reported in Verizon MA’s 5th Annual Massachusetts Price Cap Compliance Filing (2000)?

- d. How does a 5% annual rate increase compare to the Consumer Price Index reported in Verizon MA's 4th Annual Massachusetts Price Cap Compliance Filing (1999)?
- e. How does a 5% annual rate increase compare to the Consumer Price Index reported in Verizon MA's 3rd Annual Massachusetts Price Cap Compliance Filing (1998)?
- f. How does a 5% annual rate increase compare to the Consumer Price Index reported in Verizon MA's 2nd Annual Massachusetts Price Cap Compliance Filing (1997)?
- g. How does a 5% annual rate increase compare to the Consumer Price Index reported in Verizon MA's 1st Annual Massachusetts Price Cap Compliance Filing (1996)?
- h. What is the comparable Consumer Price Index for 2002?

AG-VZ-2-7 Please refer to Verizon MA's Phase I June 5, 2002, Compliance Filing, page 8, regarding the "extremely competitive markets in Massachusetts."

- a. Please explain the phrase "extremely competitive" as used in the Phase I Compliance Filing.
- b. Please explain to what "markets" you are referring.

AG-VZ-2-8 Please refer to Verizon MA's July 16, 2002 Reply Comments, page 8, regarding Verizon's proposal to require all residential customers to pay for Touch-Tone service.

- a. Please specifically explain the term "ubiquitous" as used in the Reply Comments.
- b. What percent of Verizon's residential customers presently use Touch-Tone service?

AG-VZ-2-9 Please refer to the Phase I June 5, 2002, Compliance Filing, pages 2-3, where you state that the LifeLine credit for eligible customers will be increased so as to offset the Residential Dial-Tone Line rate increase.

- a. Please explain with specificity how the increase in LifeLine credit for eligible customers will be calculated so as to offset the increase in Residential Dial-Tone Line rate.

AG-VZ-2-10 Please refer to the Phase I June 5, 2002, Compliance Filing, page 6-7.

- a. Please specifically explain the phrase “very little demand for the offering” as used in the Compliance Filing.
- b. Please explain the assertion that “the Department’s rationale for reducing the collocation rates to UNE-based charges simply does not apply in the case of end-user customers who have taken services under the tariff.”

AG-VZ-2-11 Please refer to the Phase II August 28, 2002, testimony of John Conroy, Retail Service Quality Plan Attachment, page 1, where in you state: “these measures cover almost all interactions the Company has with its retail customers.”

- a. Does the current Service Quality Plan include digital subscriber line (“DSL”) interactions between the Company and its retail customers?
- b. Does the proposed Service Quality Plan include digital subscriber line (“DSL”) interactions between the Company and its retail customers?

AG-VZ-2-12 Please provide the average monthly revenue per switched residential access line for local residential service (that is, the average revenue derived from the offering of flat-rate, measured, metropolitan, and suburban service plans that are described at http://www22.verizon.com/ForYourHome/SAS/res_fam_localcalling.asp).

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

Dated at Boston this 4th day of September, 2002.

Karlen J. Reed Assistant Attorney General Utilities Division 200 Portland Street, 4th Floor Boston, MA 02114 (617) 727-2200
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